

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

DAKOTA FISCHER,

Plaintiff,

vs.

REMINGTON ARMS COMPANY, LLC,  
REMINGTON OUTDOOR CO., INC.,  
THE MARLIN FIREARMS CO.,  
HORNADY MANUFACTURING CO.,  
and ABC COMPANIES #1 through #5,

Defendants.

CIVIL ACTION NO. 2:19-cv-01342

Judge Edmund A. Sargus, Jr.

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**Hornady Manufacturing Co.'s Reply in Support of Motion for Sanctions  
Against Non-Party Witnesses George Shope and Joshua Gee**

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Respectfully submitted:

Kevin J. Schneider, # 18898  
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*Counsel for Defendant Hornady*

Dated this 29<sup>th</sup> day of May, 2020

Hornady Manufacturing Company hereby replies with regard to its Motion for Sanctions as follows:

1. This Court ordered that George Shope and Joshua Gee respond to the Motion for Sanctions by May 22, 2020.

2. As of today's date, Hornady has not received anything from Joshua Gee and is not aware of any filing by Mr. Gee.

3. George Shope filed a letter with the Court on May 22, 2020 (filing 51.)

4. In reply, Hornady submits the Declaration of Kevin J. Schneider dated May 29, 2020 (Exhibit 1).

5. While Hornady does not believe the implications in Shope's letter that he has been dealt with unfairly by counsel for Hornady are relevant to the issues before the Court on Hornady's Motion for Sanction, Hornady nonetheless submits this declaration to clarify that it has made every effort to privately settle this dispute with Shope in a matter that is reasonable and respectful.

6. Hornady believes that its Motion for Sanctions is now fully submitted and can be decided by the Court. Hornady requests an order that George Shope and Joshua Gee be responsible for sanctions in this matter, with the amount to be determined based upon additional submissions by Hornady as to its attorney's fees, expenses and costs.

*[Signature on next page.]*

HORNADY MANUFACTURING CO.,  
Defendant

By: /s/ Kevin J. Schneider  
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*Counsel for Defendant Hornady*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which by its operation will send notification of such filing to all registered parties.

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Outdoor Co., Inc.*

I further certify that on May 29, 2020, I caused the foregoing to be served by U.S. Mail upon the below non-parties:

George Shope  
11870 State Route 139  
Jackson, OH 45640

Joshua Gee  
7141 Mount Tabor Road  
Chillicothe, OH 45601

By: /s/ Kevin J. Schneider  
Kevin J. Schneider